

From: Aaron Sherman
To: Microsoft ATR
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Subject: Propose Microsoft settlement

I'll keep this short, since I'm sure many who submit will not.

The basic problem that Microsoft's business practices present to the rest of the industry is incompatibility of interfaces. The rest of the industry works very hard in standards organizations, documentation and in other ways to unify interfaces between software applications.

Microsoft has done just the opposite. If the only change that results from this investigation is that Microsoft is forced to publish details of their interfaces between, e.g., Internet Explorer and the Windows NT/2000/XP operating systems or between Office and the Win32 subsystem in full (not in general detail), then the industry would be able to compete on those platforms with the existing Microsoft products.

Generally, this is not required of software companies because they do not straddle the operating system and application software markets. Where Microsoft does, they present a barrier to market for non-Microsoft applications simply by hiding the interfaces that their application products use.

So, in short: publish interfaces well in advance of major revisions; maintain and support published interface implementations across minor revisions; restrain Microsoft from applying for any patents which could prevent application software competitors from using said interfaces without paying royalties (note: this does not prevent Microsoft from acquiring patents, so long as they do not touch on application/platform interfaces).

Interfaces should include: save file formats; application embedding protocols and controls; network protocols; extension languages; system libraries; operating system interfaces to application such as the browser.